

INITIAL CONFERENCE QUESTIONNAIRE

CASE NAME: Justin Cohen, et al. v. City of New York, et al. **DOCKET NO.:** 21-CV-4821 (AMD) (RML)

1. Date for completion of automatic disclosures required by Rule 26(a)(1) of the Federal Rules of Civil Procedure, if not yet made:
2. If additional interrogatories beyond the 25 permitted under Rule 33(a) of the Federal Rules of Civil Procedure are needed, the maximum number by:
plaintiff(s) N/A and defendant(s) N/A
3. Maximum number of requests for admission by: plaintiff(s) 20 and defendant(s) 20
4. Number of depositions by plaintiff(s) of parties 7 non-parties 8
5. Number of depositions by defendant(s) of: parties 2 non-parties 0
6. Time limits for depositions: 1 day of 7 hours, as prescribed by Fed. R. Civ. P. 30(d)
7. Date for completion of factual discovery: August 10, 2022
8. Number of expert witnesses of plaintiff(s): 0 medical 0 non-medical
Date for expert report(s): N/A
9. Number of expert witnesses of defendant(s): 0 medical 0 non-medical
Date for expert report(s): N/A
10. Date for completion of expert discovery: N/A
11. Time for amendment of the pleadings by plaintiff(s) **see note on page 2 or by defendant(s) until 21 days after the date by which plaintiffs must amend their pleadings.
12. Number of proposed additional parties to be joined by plaintiff(s) 0 and by defendant(s) 0 and time for completion of joinder: **see note on page 2
13. Types of contemplated dispositive motions: plaintiff(s): N/A defendant(s):
Fed. R. Civ. P. 12(c), 56
14. Dates for filing contemplated dispositive motions: plaintiff(s): N/A
defendant(s): *45 days after the date by which plaintiffs must amend their pleadings.

*By this date, defendants anticipate filing a partial motion for judgment on the pleadings pursuant to Fed. R. Civ. P. 12(c). Defendants also reserve their right to file a motion for summary judgment 45 days after the close of all discovery.

15. Have counsel reached any agreements regarding electronic discovery? If so, please describe at the initial conference. No
16. Will the parties *consent to trial before a magistrate judge pursuant to 28 U.S.C. §636? (Answer no if any party declines to consent without indicating which party has declined.)
Yes ___ No ✓
17. This case should be ordered to arbitration at the close of discovery No (yes/no)
18. This case should be ordered to mediation (now or at a later date) No (yes/no)
(Prior to the Initial Conference, counsel shall discuss with their clients and their adversaries whether arbitration or mediation is appropriate in this case and be prepared to explain their reasons to the court)

**The parties disagree as to the date by which plaintiffs must amend their pleadings and complete joinder, contemplated in items #11 and #12 above. Plaintiffs propose June 10, 2022, and defendants propose March 28, 2022.

* The fillable consent form AO 85 may be found at https://www.nyed.uscourts.gov/forms/allforms/general_forms and may be filed electronically upon completion prior to the initial conference, or brought to the initial conference and presented to the Court for processing.